



SHIRYAK, BOWMAN  
ANDERSON, GILL &  
KADOCHNIKOV LLP

Alexander Shiryak, Esq.  
Dustin Bowman, Esq.  
Mark Anderson, Esq.  
Navpreet K. Gill, Esq.  
Alexander Kadochnikov, Esq.

---

80-02 Kew Gardens Road, Suite 600, Kew Gardens, New York 11415  
Tel: (718)-577-3261 Fax: (718)744-2455

February 7, 2022

The Honorable Judge Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: 1:22-mc-000034 *In re Application of Carolina Andraus Lane* Request to Issue Additional  
Subpoena Naming Corporation as Deponent

Dear Judge Schofield:

I am counsel for the Applicant, Carolina Andraus Lane (hereinafter “Applicant”), in the above-captioned matter. I filed a motion for Discovery for use in Foreign Proceeding on Applicant’s behalf on February 3, 2022 (*See* Docket No. 1). The matter was assigned to you today, February 7, 2022, and an Order was entered directing Applicant to serve a copy of the order and the papers in support of the Application. (*See* Docket No. 8).

I am writing to respectfully request that the court permit Applicant to issue an additional subpoena naming Donald Fox and Rafael Urquia II of **Fox Horan & Camerini LLP** as a Deponents. Pursuant to Your Honor’s February 7, 2022 Order, Donald Fox shall be permitted to object should he choose to do so.

The proposed subpoenas are attached hereto as Exhibit G and H.

This is a first request to issue an additional subpoena. We thank the Court for its time and effort in consideration of this matter.

Respectfully submitted,

/s/ Kadochnikov

---

Alexander Kadochnikov, Esq.